

Joint open letter on concerns over PEF methodology for textiles

Brussels, 23rd November 2022

Dear Executive Vice-President Timmermans,

Dear Commissioner Thierry Breton,

Dear Commissioner Sinkevičius,

Dear Commissioner Wojciechowski,

CC Director Generals: Kerstin Jorna, Florika Fink-Hooijer, Wolfgang Burtscher.

We, the undersigned civil society, farmers, and business organisations, are writing to ask you to ensure that the **methodology** considered by the European Commission to assess the **environmental impact of textile products** provides for **detailed, fair, and unbiased** results. To this end, we insist on the need to **reconsider** the use of **the Product Environmental Footprint (PEF)** or any set of indicators mirroring the content of the PEF as the sole tool to calculate such impact. The agreed methodology used to underpin the environmental impact of textile products must support the shift to a climate-neutral, energy-efficient, and circular economy, in line with the objectives of the Circular Economy Action Plan and specifically, the EU Strategy for sustainable and circular textiles.

The current dominant textile industry is a major source of greenhouse gas emissions, non-circular practices, excessive pesticide, insecticide, and chemical fertilizer use, damaging surrounding ecosystems, and threatening workers' health¹. This is exacerbated and fuelled by vast overproduction and overconsumption: between 2000 and 2014, clothing production has doubled². Public opinion surveys evidence widespread EU citizens' dissatisfaction with the current textile sector: over 80% of EU citizens are in favour of an environmental impact and labour conditions labelling on clothing products, as well as stricter rules³.

A framework evaluating the environmental and social footprint can positively help the sustainability transition in the fashion and textile industry, prevent greenwashing, and ensure transparent consumer information, but only if based on a methodology that adequately considers the externalities stemming from the textile sector^{4 5}.

The PEF is currently being considered by the Commission services as a basis for the upcoming substantiating green claims proposal that will also apply to textiles production. While we fully support meaningful and balanced environmental and social information of textile products, we would like to point your attention to the **shortcomings of the PEF and the indicators used** as the proposed methodology to underpin this information.

The product-focused PEF serves well to compare manufactured industrial goods. However, the approach significantly **lags when evaluating the environmental performance of complex agricultural systems**, including natural fibre production, **in a holistic way**. For the first time since 2013, the PEF will be used to compare farmed products with mined products, and it currently does not allow for an equal comparison. The PEF system caters to like-with-like comparisons, but assessments of textiles made from natural and renewable versus finite, fossil-based synthetic resources are simply not comparable because, *inter alia*, **the impacts of forming natural fibres are fully accounted for but omitted for fossil fuel-based fibres**.

When applied to agriculturally derived natural products, such as cotton, wool, hemp, jute, kenaf, and flax, PEF gives **misleading results**: synthetic, industrial fibre production tends to score better than more extensive, agricultural practices, while disregarding both several positive and negative externalities of the production process.

The Norwegian Consumer Authority, in collaboration with the Dutch Authority for Consumers and Markets, has already recognized the shortcomings of current LCA-based methods in October 2022, when it stated that environmental claims based on the Higg Material Sustainability Index needed to be revised to mitigate the risk of being misleading to consumers, violating Norwegian greenwashing regulations, and prohibited in the EU/EEA area⁶.

Specifically, Life cycle assessment methodologies such as the PEF enable the continuation of the overproduction driven by the current fast fashion market, which relies heavily on fossil fuel-derived materials. This stands in contradiction with the EU's sustainability and circularity ambitions as stated in the Circular Economy Action Plan, and specifically the EU Strategy for sustainable and circular textiles.

Besides this general observation, four concrete shortcomings need to be highlighted.

- Firstly, the **PEF does not account for the impacts of production systems on biodiversity** or the use of pesticides – an increasingly focal point among EU citizens and a key sustainability issue addressed by natural fibre production systems. For example, organic cotton production uses no hazardous pesticides and fertilizers, thus establishing biodiverse agricultural ecosystems with less acidification and eutrophication⁷.
- Secondly, the PEF diverges with other EU environmental policies that follow the precautionary principle by **omitting the inclusion of an indicator on microplastic emissions** – another timely topic on the EU level.
- Thirdly, a sustainable textile sector also takes into account end-of-life practices. Yet, since the **PEF does not include an indicator for plastic waste**, the recycling of synthetic fibres is neglected, and the resulting plastic waste incineration and landfill practices contribute to global warming.
- Lastly, the PEF places **insufficient emphasis on the circularity** of materials⁸. A circular economy is a foundational cornerstone of EU strategy yet none of the 16 PEF indicators directly measure circularity.

Concretely, these limitations lead to results such as the ones found in the study by the 'Make the Label Count' campaign coalition, which compares fossil-fuel derived polyester (PET) sweaters versus a PET sweater from natural biological material. The study shows that (1), the respective PEF scores on 'resource' use are equal despite the renewability of the raw material, (2) the use of composting versus harmful conventional practices like incineration and landfills scored equally, and (3) the overall PEF score is about 20% worse for biological PET sweaters compared to fossil-based PET sweaters due to water scarcity impacts associated with the farm stage⁹.

The misleading outcomes of the current PEF for textile production distort the credibility of the impact ratings, not only rewarding synthetic, and industrial textile production, but even exposing sustainable textile producers to severe inequalities in market competitiveness, ultimately inhibiting the growth, sustainability, and resilience in the textile sector. In this context, 30 MEPs sent a letter to the Commission on the importance of countering greenwashing in the textile sector highlighting that "properly accounting for the inherent circular attributes of natural fibres in PEF is a necessity if the EU textile sector is to join the shift from a linear to a circular economy"¹⁰.

Concerns about the PEF methodology for agri-food products were also raised by a group of civil society and farming organizations which highlighted that "the PEF as it currently stands is not suited for measuring the environmental performance of bio-based products"¹¹. While we welcome and support the objective of fighting greenwashing in the textile sector¹², we urge the Commission to reconsider the use of the PEF or any set of indicators mirroring the content of the PEF as the sole tool to calculate such impact, in order to deliver on the EU's sustainability and circularity ambitions^{13 14}.

We would be delighted to have the opportunity to meet with you and explain in more detail the above-mentioned concerns regarding the PEF methodology as applied to the textile sector, and our recommendations to address them.

Sincerely Yours,

Eduardo Cuoco, IFOAM Organics Europe Executive Director

Lorenza Romanese, Managing Director of the European Industrial Hemp Association

Dalena White, Secretary General of the International Wool Textile Organisation

Giovanni Schneider, President of The Schneider Group

Harriet Vocking, Chief Strategy Officer at Eco-Age

¹ Ellen MacArthur Foundation. (2021). [The trends and trailblazers creating a circular economy for fashion.](#)

² UNECE. (2018). [UN Alliance aims to put fashion on path to sustainability.](#)

³ Special Eurobarometer 501. (2020, March). [Attitudes of European citizens towards the Environment.](#)

⁴ Bates Kassatly & Baumann-Pauly. (2021). [The Great Green Washing Machine Part1: Back to the Roots of Sustainability.](#)

⁵ Bates Kassatly & Baumann-Pauly. (2021). [The Great Green Washing Machine Part 2: The Use And Misuse of Sustainability Metrics In Fashion.](#)

⁶ The Norwegian Consumer Authority & Dutch Authority for Consumers and Markets. (2022). [Guidance to the Sustainable Apparel Coalition.](#)

⁷ IFOAM Organics Europe. (2022). [IFOAM-OE Position-paper Organic-textiles 2022.pdf \(organicseurope.bio\)](#)

⁸ Make the Label Count. (2022). [How PEF can be improved.](#)

⁹ Make the Label Count. (2022). [Delivering EU environmental policy through fair comparison of natural and synthetic fibre textiles in PEF.](#)

¹⁰ MEP Letter of 31 January 2022: "Countering greenwashing in the textile sector". Available [here](#).

¹¹ Open letter to the Commission sent on 7 March 2022, "Joint open letter on concerns over PEF methodology for agri-food products". Available [here](#).

¹² European Commission. (2021)., Press release, [Screening of websites for 'greenwashing: half of green claims lack evidence'](#).

¹³ Synthetics Anonymous. (2021)., [Fashion brands' addiction to fossil fuels.](#)

¹⁴ Make the Label Count. (2022). [Delivering EU environmental policy through fair comparison of natural and synthetic fibre textiles in PEF.](#)